

CORAM Europe S.r.l. Via Chiari, 36 25033 Cologne (BS) – Italia Tel. +39 030 7058211 Fax +39 030 7058240 www.coramgroup.com **AUTOMOTIVE COMPONENTS**

ISO 9001 since 1993 ISO/TS 16949 since 2008

Cologne, November 12th 2014

ANNUAL COMMUNICATION ON PROGRESS (COP)

STATEMENT OF CONTINUED SUPPORT BY THE CHIEF EXECUTIVE OFFICER (CEO)

We are pleased to confirm that CORAM Europe S.r.l. supports the ten principles of the Global Compact on human rights, labour, environment and anti-corruption. With this communication, we express our intent to implement those principles. We are committed to making the Global Compact and its principles part of the strategy, culture and day-to-day operations of our company, and to engaging in collaborative projects which advance the broader development goals of the United Nations, particularly the Millennium Development Goals. CORAM Europe S.r.l. will make a clear statement of this commitment to our stakeholders and the general public.

We recognize that a key requirement for participation in the Global Compact is the annual submission of a Communication on Progress (COP) that describes our company's efforts to implement the ten principles. We support public accountability and transparency, and therefore commit to report on progress within one year of joining the Global Compact, and annually thereafter according to the Global Compact COP policy.

Mr. Angelo Piantoni President and CEO

2013 Letter Form - Coram Europe copia



HUMAN RIGHTS PRINCIPLES

- Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and
- Principle 2: make sure that they are not complicit in human rights abuses Assessment, Policy and Goals.

Assessment, Policy and Goals: CORAM Europe S.r.l. respects and supports the Universal Declaration of Human Rights and has approved a statement outlining our position to protect human rights through our operations and in our sphere of activity. This statement is aligned to the International Labor Organization's Declaration on Fundamental Principles and Rights at Work and to the Organization for Economic Co-operation and Development's (OECD) Guidelines for International Enterprises. In addition, our company follows country regulations regarding child labor, forced labor, compensation, working hours, harassment and violence, discrimination, safety, freedom of association and legal compliance. Our employees operate in a fair and healthy working environment in accordance with the Italian law provisions as per the D.L. 81/2008 and D.L. 106/09 bills governing the safety at work.

<u>Implementation</u>: employees and contract workers can confidentially discuss any human rights concerns with our Human Resources office. Suppliers and business partners are audited annually by senior management to ensure that they are working within the defined guidelines of human rights.

<u>Measurement of outcomes</u>: no violations of the above principles have been reported or identified during 2014, continuing our long-standing history of human rights excellence.



LABOUR PRINCIPLES

- Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
- Principle 4: the elimination of all forms of forced and compulsory labour;
- Principle 5: the effective abolition of child labour; and
- Principle 6: the elimination of discrimination in respect of employment and occupation.

<u>Assessment, Policy and Goals</u>: CORAM Europe S.r.I. is a multicultural company committed in giving all of its employees equal opportunities for professional development, promotion and growth. The working conditions and standards that our company follows are clearly defined in the code of conduct. In brief, these include a clear statement of position in favour of freedom of association and the right to collective bargaining, and an equally clear position against forced labour, child labour and all forms of discrimination.

<u>Implementation</u>: our internal policies protect the rights of our employees to associate freely and bargain collectively. Workers can freely voice concerns to their management and human resources representatives. Our code of conduct promotes diversity and prohibits discrimination in age, ethnicity, gender, culture, religion, political or sexual orientation. Child labour is abolished in accordance to Italian governing laws.

<u>Measurement of outcomes</u>: Meetings between the board of directors and trade unions representatives were held quarterly in 2014. Workers were free to join collective meetings during work hours and permission to hold such meetings at the company's premises was granted. A bulletin board was posted in the workplace for trade unions representative to freely use. A special menu was made available at our canteen to accommodate for diverse religious dietary practices. The number of underage employees in 2014 is and remains 0, with an average employees age of 36.

2013 Letter Form - Coram Europe copia

Sede Legale e Produttiva: Coram Europe S.r.l. via Chiari, 36 – 25033 Cologne (BS) – Italia Distaccamento produttivo 1: Coram Europe S.r.l. via Creta, 10/12 – 25033 Cologne (BS) – Italia Registro Imprese di Brescia e Codice Fiscale n. 00816730170 – Partita IVA 00579710989 C.C.I.A.A./R.E.A. BS 101164 – M. BS 024007 – Cap. Soc. Euro 6.000.000



ENVIRONMENTAL PRINCIPLES

- Principle 7: Businesses should support a precautionary approach to environmental challenges;
- Principle 8: undertake initiatives to promote greater environmental responsibility; and
- Principle 9: encourage the development and diffusion of environmentally friendly technologies Assessment, Policy and Goals

<u>Assessment, Policy and Goals</u>: CORAM Europe S.r.l. is constantly striving to improve its standing as an eco-friendly company. Our activity revolves mostly around the machining of metal components, therefore the environmental impact is limited. However, we still try to apply general best practices and guidelines in order to improve our performance.

<u>Implementation</u>: our company has committed to achieving ISO 14001 certification within next year. A first analysis has been concluded by a designated partner consulting firm, manual procedures will be completed by year's end.

<u>Measurement of outcomes</u>: the rollout program has began in early 2014, and we have now defined detailed action plans and milestones on our road to obtain compliance within Q3 of 2015. A more detailed list of completed, ongoing and planned activities is as follows:

September 2014 December 2014 May 2015 June 2015 July 2015 End of Consultant's Analysis Completion of Manual, Procedures and Forms Training and internal audits DNV Documentation review Certification Audit

2013 Letter Form - Coram Europe copia



ANTI-CORRUPTION PRINCIPLES

- Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery

<u>Assessment, Policy and Goals</u>: CORAM Europe S.r.l. has a zero-tolerance policy regarding corruption and bribery, in accordance with country regulations and international laws. General management is directly responsible for enforcing anti-corruption practices.

<u>Implementation</u>: we maintained an internal check and balance system over transactions. The records are maintained with proper proves of all cash flows. This information is checked and controlled by finance, administration and ultimately reaches to the CEO.

<u>Measurement of outcomes</u>: our company has not been involved in any legal cases, rulings or other events related to corruption and bribery. Our books and accounts are subjected to routine scrutiny by the Italian fiscal authorities, the last of which occurred in 2013. No lack of compliance was reported and the company has passed the audit in full.